

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

FILED IN OPEN COURT
ON 6-19-2020 *gm*
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

NO. 5:20-CR-243-1FL(3)

UNITED STATES OF AMERICA)

v.)

ODALINDA MONDRAGON-ARROYO)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

On or about June 28, 2016, in the Eastern District of North Carolina, the defendant, ODALINDA MONDRAGON-ARROYO, did knowingly make a false statement and claim that she was a citizen of the United States in order to register to vote, in violation of Title 18, United States Code, Section 1015(f).

COUNT TWO

On or about October 13, 2017, in the Eastern District North Carolina, and elsewhere, the defendant, ODALINDA MONDRAGON-ARROYO, did knowingly attempt to procure her naturalization as a United States citizen contrary to law, by making a false statement under oath regarding her naturalization application, that is:

- a. On Part 12, Item 1 of defendant MONDRAGON-ARROYO's Application for Naturalization (Form N-400), in response to the question "Have you EVER claimed to be a U.S. citizen (in writing or any other way)?" she answered "No" when in fact as she then knew,

she had claimed to be a United States citizen in a voter registration application on June 28, 2016.

- b. On Part 12, Item 2 of defendant MONDRAGON-ARROYO's Application for Naturalization (Form N-400), in response to the question "Have you EVER registered to vote in any Federal, State, or local election in the United States?" she answered "No" when in fact as she then knew, she had registered to vote on June 28, 2016.

All in violation of Title 18, United States Code, Section 1425(a).

COUNT THREE

On or about October 13, 2017, in the Eastern District of North Carolina, and elsewhere, the defendant, ODALINDA MONDRAGON-ARROYO, did knowingly make under oath, and did knowingly subscribe as true under penalty of perjury under Title 28, United States Code, Section 1746, a false statement with respect to a material fact in an application required by the immigration laws and regulations prescribed thereunder, that is, defendant MONDRAGON-ARROYO stated falsely in an Application for Naturalization (Form N-400) that she had never claimed to be a United States citizen and she had never registered to vote in any Federal, State, and local election in the United States, when in fact, as she then and there knew, she had claimed to be a United States citizen and registered to vote in a Federal, State, and local election on June 28, 2016.

All in violation of Title 18, United States Code, Section 1546(a).

COUNT FOUR

On or about October 13, 2017, in the Eastern District of North Carolina, and elsewhere, the defendant, ODALINDA MONDRAGON-ARROYO, did knowingly make a false statement under oath in a case, proceeding, and matter relating to, and under, and by virtue of any law of the United States relating to naturalization, citizenship, and registry of aliens, that is, defendant MONDRAGON-ARROYO stated falsely under oath in an Application for Naturalization (Form N-400) that she had never claimed to be a United States citizen and she had never registered to vote in any Federal, State, and local election in the United States, when in fact, as she then and there knew, she had claimed to be a United States citizen and registered to vote in a Federal, State, and local election on June 28, 2016.

All in violation of Title 18, United States Code, Section 1015(a).

COUNT FIVE

On or about May 23, 2018, in the Eastern District North Carolina, and elsewhere, the defendant, ODALINDA MONDRAGON-ARROYO, did knowingly attempt to procure her naturalization as a United States citizen contrary to law, by making a false statement under oath regarding her naturalization application, that is:

- a. On Part 12, Item 1 of defendant MONDRAGON-ARROYO's Application for Naturalization (Form N-400), in response to the question "Have you EVER claimed to be a U.S. citizen (in writing or any other way)?" she answered "No" when in fact as she then knew,

she had claimed to be a United States citizen in a voter registration application on June 28, 2016.

- b. On Part 12, Item 2 of defendant MONDRAGON-ARROYO's Application for Naturalization (Form N-400), in response to the question "Have you EVER registered to vote in any Federal, State, or local election in the United States?" she answered "No" when in fact as she then knew, she had registered to vote on June 28, 2016.

All in violation of Title 18, United States Code, Section 1425(a).

COUNT SIX

On or about May 23, 2018, in the Eastern District of North Carolina, and elsewhere, the defendant, ODALINDA MONDRAGON-ARROYO, did knowingly make under oath, and did knowingly subscribe as true under penalty of perjury under Title 28, United States Code, Section 1746, a false statement with respect to a material fact in an application required by the immigration laws and regulations prescribed thereunder, that is, defendant MONDRAGON-ARROYO stated falsely in an Application for Naturalization (Form N-400) that she had never claimed to be a United States citizen and she had never registered to vote in any Federal, State, and local election in the United States, when in fact, as she then and there knew, she had claimed to be a United States citizen and registered to vote in a Federal, State, and local election on June 28, 2016.

All in violation of Title 18, United States Code, Section 1546(a).

COUNT SEVEN

On or about May 23, 2018, in the Eastern District of North Carolina, and elsewhere, the defendant, ODALINDA MONDRAGON-ARROYO did knowingly make a false statement under oath in a case, proceeding, and matter relating to, and under, and by virtue of any law of the United States relating to naturalization, citizenship, and registry of aliens, that is, defendant MONDRAGON-ARROYO stated falsely under oath in an Application for Naturalization (Form N-400) that she had never claimed to be a United States citizen and she had never registered to vote in any Federal, State, and local election in the United States, when in fact, as she then and there knew, she had claimed to be a United States citizen and registered to vote in a Federal, State, and local election on June 28, 2016.

All in violation of Title 18, United States Code, Section 1015(a).

COUNT EIGHT

On or about May 29, 2018, in the Eastern District North Carolina, and elsewhere, the defendant, ODALINDA MONDRAGON-ARROYO, did knowingly procure her naturalization as a United States citizen contrary to law, by making a false statement under oath regarding her naturalization application, that is:

- a. On Part 12, Item 1 of defendant MONDRAGON-ARROYO's Application for Naturalization (Form N-400), in response to the question "Have you EVER claimed to be a U.S. citizen (in writing or any other way)?" she answered "No" when in fact as she then knew, she had claimed to be a United States citizen in a voter registration application on June 28, 2016.

- b. On Part 12, Item 2 of defendant MONDRAGON-ARROYO's Application for Naturalization (Form N-400), in response to the question "Have you EVER registered to vote in any Federal, State, or local election in the United States?" she answered "No" when in fact as she then knew, she had registered to vote on June 28, 2016.

All in violation of Title 18, United States Code, Section 1425(a).

A TRUE BILL

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

5/19/2020

DATE

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich
BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney